FINDING OF SUITABILITY TO LEASE (FOSL)FOR PARCELS T005 AND T006 AT NAVAL STATION TREASURE ISLAND

Prepared for:

Engineering Field Activitiy West Naval Facility Engineering Command San Bruno, California Contract No. N62474-92-D-3608 Delivery Order 0021

Prepared by:

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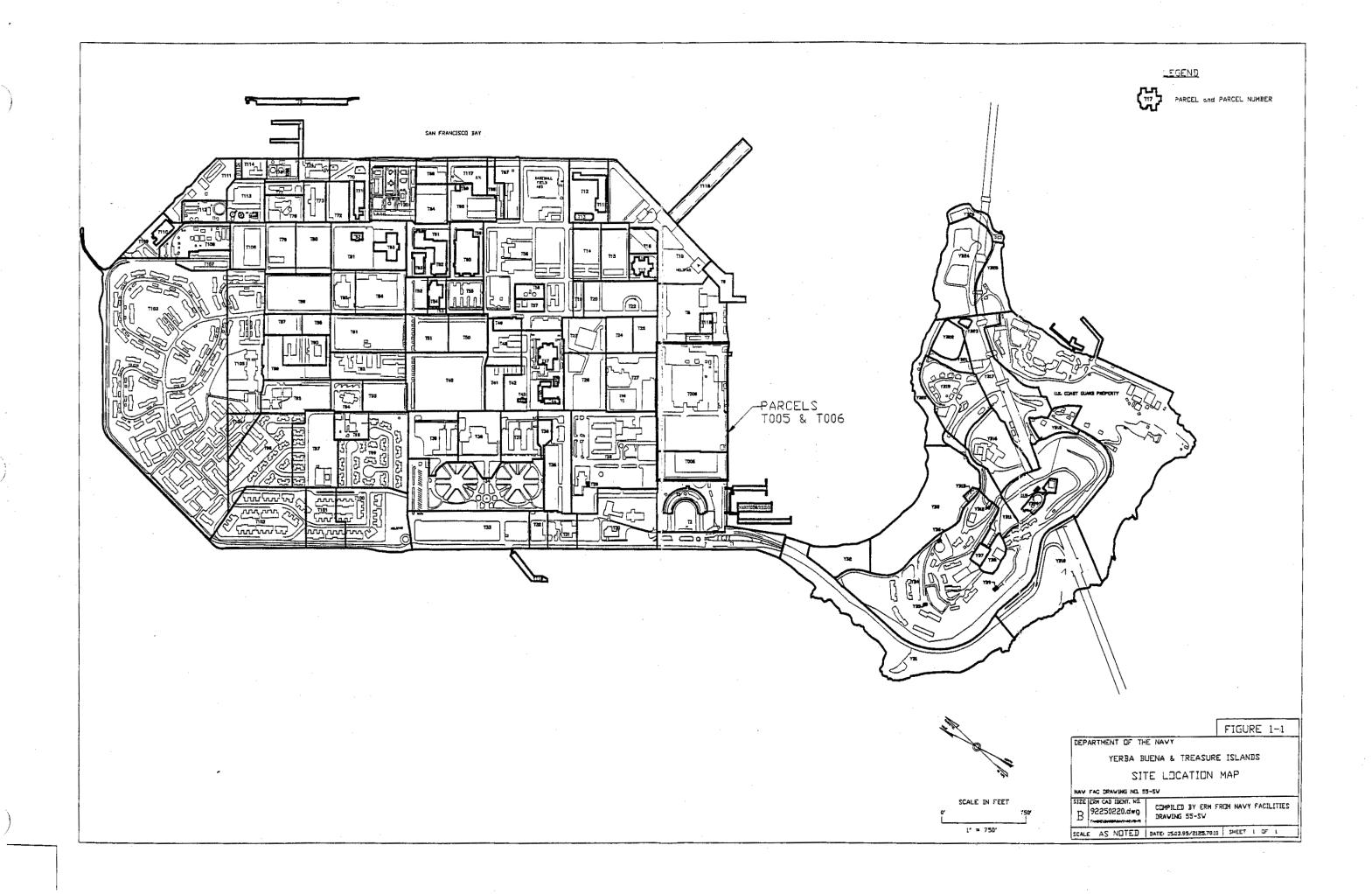
1. Purpose

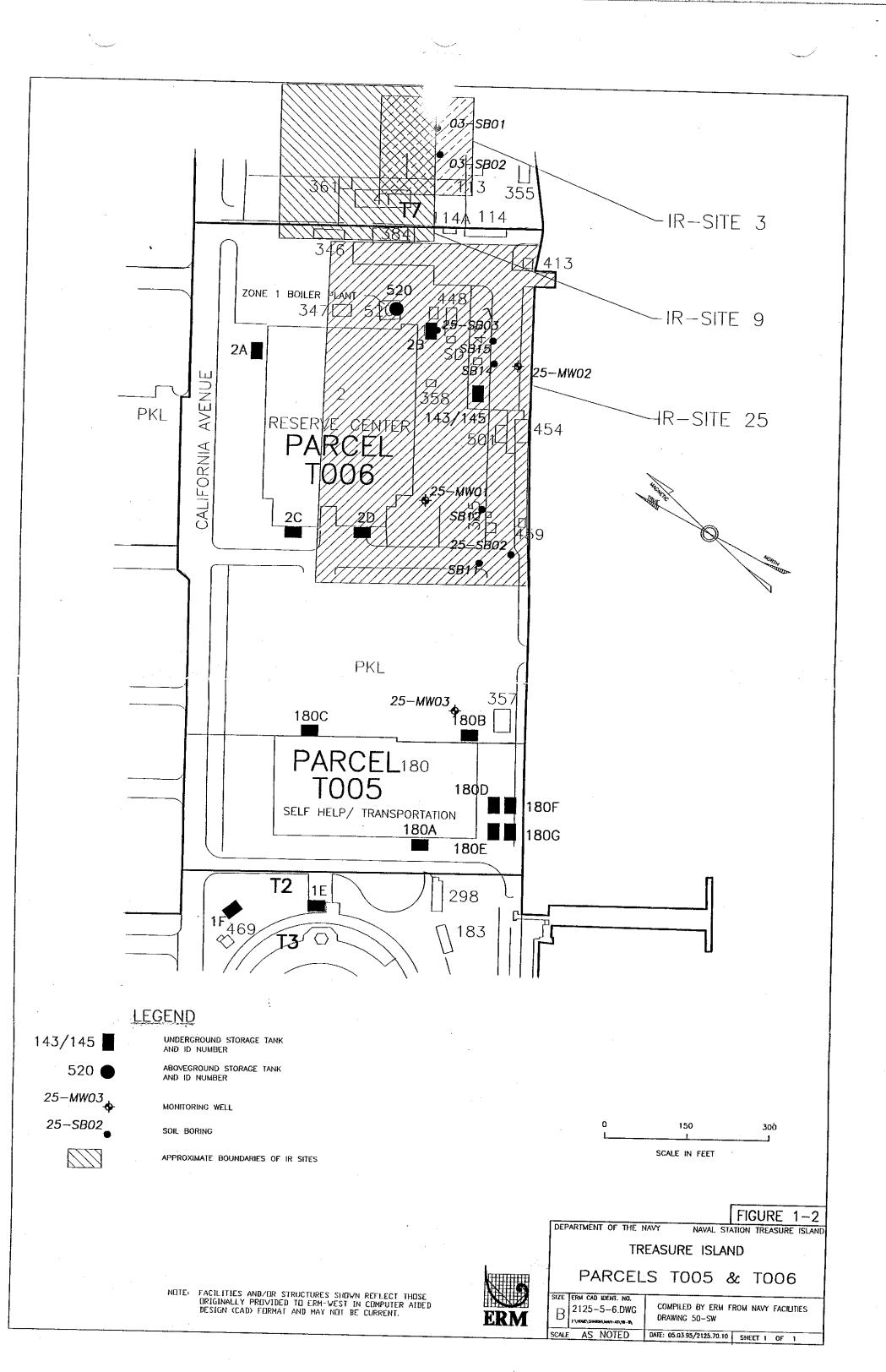
- a. The purpose of this Finding of Suitability to Lease¹ (FOSL) is to document environmentally related findings regarding the proposed lease of property at Naval Station Treasure Island (NSTI) in San Francisco County, California. The property is described in Section 2 below and is shown in Figures 1-1 and 1-2. Buildings 2 and 180 are currently under a one year license from the Department of the Navy to the City of San Francisco. The Navy is planning a follow-on lease to the City of San Francisco for the buildings and associated areas for the purposes of movie production. The terms of the proposed lease and the renewal options have not been determined.
- b. This FOSL is a result of a thorough analysis of information contained in the following documents: Final Limited Environmental Baseline Survey/Community Environmental Response Facilitation Act Report for Naval Station Treasure Island (ERM-West, Inc., December 1, 1994); and Environmental Baseline Survey Report for Naval Station Treasure Island (ERM-West, Inc., May 19, 1995).

2. Property Description

The property is comprised of Parcels T005 and T006 and is 16.9 acres in size. Parcel T005, approximately 1.9 acres in size, is currently used for movie set construction, as a self-help facility, and as a Navy Public Works Center, San Francisco Bay (PWCSFB) vehicle maintenance area. The self-help facility is a storage facility for home/office repair and maintenance equipment. Storage includes paint, building materials, and tools. Currently, one large building (Building 180) and one structure (Structure 180, a fueling station) occupy approximately 40

¹ This FOSL has been prepared in accordance with the *Defense Environmental Response Task Force (DERFT) Draft Model FOSL*, May 20, 1994.





percent of the parcel. The remaining 60 percent of the parcel is open space consisting primarily of parking areas and streets. The vehicle fueling station is located on the southern side of Building 180, and some of the vehicle maintenance activities are conducted outside, along the northern side of Building 180.

Historically, the parcel has been used for reserve training, vehicle maintenance, PWCSFB shops, seaplane maintenance, and a transportation center. Building 180 was constructed in 1943. Former Building 299 is visible on NSTI drawings as early as 1945; this building was demolished prior to February 1961. Building 299 was described as a loading shed and weighing station.

Parcel T006, approximately 15 acres in size, is currently being used by a film studio. The following buildings and structures are currently present on Parcel T006: one large building (Building 2); numerous small buildings (Buildings SD, 114, 141, 143, 346, 358, 384, 385, 413, 448, 454, 459, 501, and 520); and several structures, including a radio tower (Structure 383), a gun mount (Structure 347), a shed, an active vehicle wash down area, foundations of two former vehicle wash down areas (former Buildings 356 and 357), several flammable materials storage cabinets, and several additional storage areas. Buildings and structures occupy approximately 20 percent of the parcel. The remaining 80 percent of the parcel is open space, primarily consisting of asphalt and concrete-paved parking areas, streets, and staging areas for the film company.

Historically, Parcel T006 was used as the Seaplane Maintenance Area. Building 2 functioned as hangars for the planes and as a terminal building for travelers.

3. Regulatory Coordination

The California Environmental Protection Agency (Cal-EPA), Department of Toxic Substances Control (DTSC), the Regional Water Quality Control Board (RWQCB), and the USEPA were notified at the initiation of the EBS and the FOSL and were provided workable draft documents to facilitate their consultative role in developing the environmental documents. Regulatory comments received during the EBS and FOSL development were reviewed and addressed, incorporated, or appended as appropriate.

4. National Environmental Policy Act (NEPA) Compliance

The proposed lease addressed by this FOSL is consistent with the community reuse plan used by the Navy and analyzed in the NEPA document for Parcels T005 and T006 at NSTI. The environmental impacts of this proposal are currently being analyzed and will be disclosed in compliance with NEPA.

5. Environmental Baseline Survey Findings

Based on a review of the Final Environmental Baseline Survey/ Community Environmental Response Facilitation Act report for NSTI, which included a visual site inspection of the parcels, Parcels T005 and T006 are considered DOD Environmental Condition Area Type 6. BRAC Area Type 6 identifies areas where storage, release, disposal, and/or migration of hazardous substances or petroleum products has occurred, but required response actions have not yet been implemented. A listing of environmental factors and resources considered in the EBS property assessment is provided in Table 1.

5.1 Factors and Resources That Pose No Constraints

After evaluation of the environmental documents listed in Section 1.b of this document, the environmental factors and resources including potential oil/water separator, pesticides, medical/biohazardous waste, wastewater discharges, radioactive and mixed wastes, solid waste, as well as the disclosure issue radon, have been determined to pose no known threat to human health and the environment on NSTI. These issues are discussed in Sections 2.1.6, 2.1.7, 2.1.8, 2.1.10, 2.1.11, 2.1.12, and 2.4.3 of the Parcel-Specific Environmental Baseline Survey for Parcel T005 and T006 at Naval Station Treasure Island. Therefore no specific restrictions are required in the lease for these factors.

5.2 Factors and Resources That Pose Constraints (Require Lease Restrictions)

After evaluation of the environmental documents listed in Section 1.b of this document, several environmental factors and resources have been determined to pose constraints on activities which might be accomplished under the proposed lease. The recommended lease restrictions based on these factors and conditions are presented in Section 8 of this document. The factors and resource conditions are as follows:

- 5.2.1 <u>Groundwater</u>: Chemical concentrations of benzene in groundwater samples collected from one monitoring well on Parcel T006 have exceeded MCLs. Elevated levels of other organic compounds have also been detected in areas of former USTs. Groundwater monitoring will be performed at all monitoring wells on Parcel T006 by the Navy Installation Restoration Program (IR) contractor.
- 5.2.3 <u>Installation Restoration Sites</u>: IR Site 25 (Seaplane Maintenance Area) is located on Parcel T006 approximately 250 feet east of Parcel T005. Two IR Sites, IR Site 9 (Foundry) and IR Site 3 (Electrical Equipment Maintenance Area), are located within 100 feet east of Parcel T006. Investigations are being performed at IR Sites 25 and 9. No additional subsurface investigation relative to IR Site 3 is proposed by the IR contractor; therefore, no lease restrictions would be imposed for IR Site 3. Results of the IR investigations are further detailed in the parcel-specific EBS for Parcels T005 and T006.
- 5.2.4 Ordnance: Small ammunition (i.e. bullets) are currently stored in Building 454 on Parcel T006. The ammunition stored in Building 454 is used by the NSTI security personnel and is stored in sealed packages prior to use. There was no evidence or records of releases associated with the ordnance storage in these buildings.

Building 454, the only building that currently stores ammunition, is kept locked at all times and is surrounded by a locked chain link fence. Warning signs are also posted on the fence. Although storage of ordnance has occurred and is ongoing at Parcel T006, this storage consists of small, packaged ammunition, and therefore it is unlikely that such storage has resulted in a release to the environment.

5.2.5 <u>Underground Storage Tanks (USTs)</u>: Four USTs (#180D, #180E, #180F, and #180G) are currently located on Parcel T005, near the fuel island on the southern side of Building 180. UST #180A, formerly present at Parcel T005, was removed in May 1992.

Several USTs, including UST #2A, #2C, #2D, #180B, and 180C, formerly existed at Parcel T006 and have been removed. Parcel T006 also contains several suspected USTs, which are designated UST #2B, #145, and Location 143. Results of UST investigations are detailed in the parcel-specific EBS for Parcels T005 and T006. Further investigation to confirm the presence of these tanks is recommended.

6. Other Related Environmental Factors

Other related factors that do and do not pose constraints are detailed below.

6.1 Resources That Pose No Constraints

Factors which pose no environmental concern and would not preclude or restrict real property leasing include air quality, biological resources, threatened/endangered species, and historic structures.

6.2 Resources That Pose Constraints (Require Lease Restrictions)

Factors of concern with known or likely presence that could require special management attention and present a liability to or impose a mandate on the Navy include:

- 6.2.1 Polychlorinated Biphenyls (PCBs) The lessee/sublessee will be advised, via the Environmental Condition Report (ECR) and in the lease, that eight transformers and four electrical switches are located on the property. Five transformers and three switches contain levels of PCBs below the 5 parts per million (ppm) action threshold. The other equipment includes two dry-type transformers, one temporary transformer and one temporary switch, all of unknown PCB content. Additionally, the lessee will be provided with a list indicating equipment location and the existence of PCB contamination associated with the equipment, if applicable. The Navy will be responsible for disposing of PCB-containing equipment. The Navy Public Works Center is conducting inspections of caged transformers as well as transformer oil sampling to assess PCB content. The Navy will be responsible for any necessary remediation of the PCB contamination from PCB-containing equipment.
- 6.2.2 Asbestos The lessee will be advised through lease documents of the presence, location and condition of the ACM. The Lease will require the Lessee to monitor the conditions of existing ACM and comply with all applicable laws and regulations relating to asbestos. The Lease will require the Lessee to remove or remediate any ACM which, during the period of the lease, becomes damaged or deteriorated.
- 6.2.3 Lead-Based Paint Lead-based paint is a potential environmental concern in Buildings 2 and 180. The lessee will be notified of the presence of lead-based paint and restricted from construction,

alteration, or modification (to include paint stripping or sanding) without prior testing of the paint and notification of and approval by the Navy prior to initiation of the activity.

7. Notice of Hazardous Substances

Hazardous substances are known to have been stored on Parcels T005 and T006. This information has been described in the Final Limited Environmental Baseline Survey/Community Environmental Response Facilitation Act Report for Naval Station Treasure Island (ERM-West, Inc., dated December 1, 1994), and the Environmental Baseline Survey Report for Naval Station Treasure Island (ERM-West, Inc., dated May 19, 1995). Hazardous substances have been stored and/or used on the two parcels as well as the on-site and nearby IR Sites. This information is summarized in the parcel-specific EBS for Parcels T005 and T006 at NSTI. Table 2 provides the notice of hazardous substances.

8. Recommended Lease Restrictions

Restrictions contained herein are a result of the environmental findings identified in the parcel-specific EBS for Parcels T005 and T006 and were assessed in accordance with USEPA Region IX *Evaluation of Risks for the Purpose of Reaching a FOSL*, January 9, 1995. Parcels T005 and T006 may be used pursuant to the proposed lease, with the following specified use restrictions in the lease, with acceptable risk to human health and the environment.

- a. The lessee and/or authorized sublessee shall not dispose of any hazardous waste at the Leased Premises.
- b. The lessee and/or authorized sublessee shall be responsible for obtaining all necessary permits and licenses for their own operation. Any violation of permit conditions shall be grounds to require the lessee and/or authorized sublessee to cease operations or to terminate the lease. The lessee shall comply with CEQA requirements as may be applicable.
- c. The lessee shall submit all proposed construction and modification plans to the Navy for prior approval to ensure protection of human health and the environment at the Leased Premises.

- d. The lessee shall be prohibited from digging any foundations, trenches, ditches, holes, or otherwise disturbing the soil, including soils below the groundwater table, at the Leased Premises unless proper dust control measures and appropriate health and safety protection measures are implemented and maintained during these activities.
- e. The lessee shall be prohibited from installing any groundwater wells at the Leased Premises, or otherwise utilizing groundwater without prior approval from California EPA.
- f. The lessee and/or authorized sublessee shall be prohibited from use of or entrance into Building 454 (ordnance storage) and/or surrounding fence and obey all warnings as posted.
- g. Uses by the lessee and authorized sublessee are limited to a type and nature of use that is described in the lease document.
- h. The Navy and regulatory agencies reserve the right to enter upon the Leased Premises to conduct investigations and surveys, collect samples, perform remediation, access monitoring wells, or engage in other activities associated with the IR, UST, and EBS programs.

9. Finding of Suitability to Lease

Based on the foregoing information and analysis, I find that the property (as identified in Section 2.0) is suitable to lease and may be used pursuant to the proposed lease, with the specified use restrictions in the lease, with acceptable risk to human health or the environment and without interference with the environmental restoration process.

Date

R. G. HOCKER, CAPT, CEC, USN
Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command

Environmental Factor/Resource	Use of Leased Property May Impact Factor/Resource	Factor/Resource May Constrain Lease
Hazardous Substances:		
Installation Restoration Program		X
Hazardous Materials		
Hazardous Wastes		X
Radiological Materials		
Pesticides/Herbicides		
Medical/Biohazardous Wastes		
Above Ground Storage Tanks		
Underground Storage Tanks		X
Potential Oil/Water Separator		
Water Resources:		
Surface Water		
Wetlands		
Floodplains		
Ground Water		X
Air Resources:		
Air Quality		
Air Conformity		
Air Permits		
Biological Resources:		
Threatened/Endangered Species		
Sensitive Habitat	7.	
Utilities:		
Transportation		
Wastewater		
Drinking Water		
Energy (Natural Gas, Elec., Coal, etc.)		
Cultural Resources:		
Historic Preservation		
Archeological		
Native American		
Other:		
Ordnance		X
Asbestos		X
Lead-Based Paint		X
PCBs		X
Radon		
Solid Wastes		
Prime/Unique Farmlands		

Notice of Hazardous Substances at Parcels T005 and T006

Parcels	Facility Number	Facility Name	Hazardous Substance	Hazardous Materials Storage (1000 kg or more for one year or more)	Hazardous Materials Storage (less than 1000 kg per year)	Hazardous Substances Release	Hazardous Substance Disposal Onsite	Dates
T005	Open space	Flammable materials storage cabinets	Paint, gasoline, vehicle maintenance chemicals, used oil	Yes	No	No	No	1980s to Present
T005	Building 180	Building 180	Nonhalogenated organics, fuel products	Yes	No	No	No	1943 - ?
T005	South of Building 180	Fueling Station	Fuel Products	Yes	No	No	No	? - Present
T006	Open space	SW side of Avenue D	Paint, floor finish, epoxy, adhesives, wood preservative, polyurethane, and glue	No	Yes	No	No	1980s to Present
T006	Building 2	Building 2	Paint, glue, lubricating oil	No	Yes	No	No	1938 to Present
T006	Building 358	Building 358	Antifreeze, lubricating oil	No	Yes	No	No	1953 to Present

Notice of Hazardous Substances at Parcels T005 and T006

Parcels	Facility Number	Facility Name	Hazardous Substance	Hazardous Materials Storage (1000 kg or more for one year or more)	Hazardous Materials Storage (less than 1000 kg per year)	Hazardous Substances Release	Hazardous Substance Disposal Onsite	Dates
T006	Building SD	Building SD	Kerosene, propane, unidentified chemicals	No	Yes	No	No	1938 to Present
T006	Building454	Building 454	Ordnance (bullets for security guards)	Yes	No	No	No	1968 to Present
T006	Open space	SW corner of parking lot in front of Bldg 2	Paint, linseed oil, epoxy, floor finish, wood preservative	No	Yes	No	No	? to Present
T006	Open space	W of Bldg 114	Nonhalogenated organics, petroleum hydrocarbons	No	Yes	No	No	1940s to Present
T006	Open space	South of Bldg 520	diesel fuel and corrosives	Yes	No	No	No	Unknown
T006	Open space	South of Bldg 2	Fuel products, nonhalogenated organics	Yes	No	Unknown	No	1940s
T006	Open space	Near Bldg 346	diesel fuel, antifreeze, used oil	Yes	No	No	No	Unknown